

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

| UNITED STATES OF AMERICA |) Criminal No. 1:23-CR-44 (BKS) |
|--------------------------|--|
| v. |) Indictment |
| SHAUN MORANT, |) Violations: 18 U.S.C. § 2251(a) [Sexual Exploitation of a Child] |
| | 18 U.S.C. § 2252A(a)(2)(A) [Receipt of Child Pornography] |
| |) Three Counts and One Forfeiture Allegation |
| Defendant. |) County of Albany) Offenses: |

THE GRAND JURY CHARGES:

COUNT 1 [Sexual Exploitation of a Child]

From on or about January 11, 2022 through on or about January 13, 2022, in Albany and Schenectady Counties in the Northern District of New York, and elsewhere, the defendant, SHAUN MORANT, did use, persuade, induce, entice, and coerce a minor, that is Jane Doe #1, a female child born in 2012 whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and in an affecting such commerce, and where the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and where such visual depictions were actually transported and transmitted using a means and facility of

interstate and foreign commerce, and in and affecting such commerce, in violation of Title 18, United States Code, Section 2251(a).

COUNT 2 [Receipt of Child Pornography]

Between on or about January 11, 2022 and on or about January 13, 2022, in Albany and Schenectady Counties in the Northern District of New York, and elsewhere, the defendant, SHAUN MORANT, did knowingly receive child pornography using a means and facility of interstate and foreign commerce, shipped and transported in and affecting such commerce by any means, including by computer, in that the defendant, using the Internet, and an account with the social media service Instagram, knowingly received numerous video files depicting Jane Doe #1, a female child born in 2012 whose identity is known to the grand jury, engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT 3 [Receipt of Child Pornography]

Between in or about January, 2020 and in or about April, 2022, in Albany and Schenectady Counties in the Northern District of New York, and elsewhere, the defendant, SHAUN MORANT, did knowingly receive child pornography using a means and facility of interstate and foreign commerce, shipped and transported in and affecting such commerce by any means, including by computer, in that the defendant, using the Internet, and an account with the social media service Instagram, knowingly received numerous still image files depicting John Doe #1, a male child born in 2012 whose identity is known to the grand jury, engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

FORFEITURE ALLEGATION

The allegations contained in Counts One through Three of this indictment are hereby

realleged and incorporated by reference herein for the purpose of alleging forfeiture pursuant to

Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253(a)(3), upon conviction of an offense

in violation of Title 18, United States Code, Section 2251 or Section 2252A, as set forth in Counts

One through Three of this indictment, the defendant, SHAUN MORANT, shall forfeit to the

United States of America any property, real and personal, used and intended to be used to commit

and to promote the commission of such offense.

The property to be forfeited includes, but is not limited to, the following:

1) a Samsung Model SM-J260A smartphone with IMEI # 353568101404050.

Dated: January 31, 2023

A TRUE BILL, *Name redaction

Grand Jury Foreperson

CARLA B. FREEDMAN United States Attorney

By:

Richard Belliss

Assistant United States Attorney

Bar Roll No. 515295